

REMARKS/ARGUMENTS

In the present response, a declaration as drawn under the provisions of 37 CFR 1.132 is submitted. This is the second such declaration provided to the record.

At the outset, applicants refer to the Examiner's Response to Arguments indicating that the features upon which the applicants rely, a search criteria are not recited in the rejected claims. It appears that the Examiner has missed the salient point of the invention. The first two families of claims commencing with claims 1 and 13 look to techniques by which a search question can be developed and while not using the terms "search", recite the steps constituting a search. This search question development is described as opposed, for example, to relying entirely on key words which appears to be the approach of the Patent Office. As is apparent, that approach is not optimal. The technique at hand is one of getting to the search question or rule using node nets with attractors and document symbols. The term "search" does appear in the title of the application and the Examiner should be aware that the term indeed does appear in claims 22-24.

Just as the Examiner conjures key words as a prelude to carrying out a search, the present invention develops a search question or rules through the utilization of node nets with attractors and document symbols. There are no document symbols or node nets with attractors at all in the references.

Now looking to the rejection of record as commencing at page 13 of the Office Action, it is noted that claims 1-21 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U. S. Patent No. 7,085,755 to Bluhm, et al., (hereinafter Bluhm) in view of U. S. Patent Application Publication No. 2005/0086238 to Nevin, III (hereinafter Nevin). As set forth in ¶15 of the annexed declaration, Bluhm describes a document management system providing for the storing and organization of documents. This management includes duplicate detection and an organization of documents based upon a fingerprint geared towards recognizing if two documents are likely to be identical and if they are similar within minor editorial changes that might move word positions. As noted at ¶16 of the declaration, by contrast, the claims and specification of the present application describe a method for evaluating the text content of a document database wherein nets and document symbols are utilized initially to develop search questions or rules. That is the key to carrying out a good search and that's an important aspect of the subject matter of the claims at hand. The Examiner has applied Bluhm at column 26, line 8 through column 27, line 14 with respect to step (d) of claim 1 for fingerprinting the gathered documents. As set forth at ¶18 of the declaration, the fingerprinting described at the pertinent columns of Bluhm sets forth a word vector approach wherein the fingerprint - the word vector of

the six most common words in a population are combined with a document count and position vector and comparison is made to see if two documents are likely to be identical. The fingerprinting described in the present application is quite different. As set forth at ¶9 of the declaration this word vector form of fingerprint would render following steps of claim 1, particularly steps (f) through (k) inoperable in that the entire document content must be fingerprinted in order to carry out such steps.

The Examiner has cited column 6, lines 33-47 of Bluhm with respect to step (e) of claim 1 for determining a text criteria with respect to the document population. As set forth at ¶11 of the declaration, the cited column and lines are not relevant to text criteria, the lines describing that documents can be stored in aggregations or collections, whereas the text criteria recited in the step (e) is later evaluated and treated, for instance, in an iterative sense to develop a question or questions to be employed in subsequent searching.

The Examiner then turns to Nevin, describing that it discloses a method of displaying and storing data in linked to nodes. In this regard with respect to step (f) the Examiner has identified Fig. 1 in Nevin. As noted at ¶13 of the declaration, Nevin provides a collection of nodes which are inter-associated by a relationship while the nodes of the present application are associated with an interaction, specifically, an effective force that attracts documents with related content. This is quite different from a relationship wherein the spacing and geometric location of nodes is important to the user as taught by Nevin. By contrast, as set forth at ¶14 of the declaration, the spacing and geometric relationship of nodes in the nets of the present invention are entirely arbitrary and of no consequence.

Step (g) of claim 1 describes the loading of text criteria into at least one of the nodes and the Examiner has rejected that step with respect to ¶0081 of Nevin. As set forth at ¶15 of the declaration, Nevin describes an organization algorithm and not this text criteria which is utilized with a node to evolve a search question whereupon a search may then be undertaken.

Step (h) of claim 1 sets forth that for each document of the database, there is calculated geometric relative distance from a node to derive one or more node attractors. In rejecting the step, the Examiner has identified ¶¶0031 and 0185 of Nevin and has commented that the connection strength of the link from one node to another is considered to represent the "relative distance". As set forth at ¶17 of the declaration, Nevin describes that predetermined attribute data is stored into nodes and these nodes are linked by relationships of variable lengths. By contrast, step (h) provides that for each document of a database its geometric relative distance from one or more nodes is calculated. There are no documents in Nevin by which such calculation may be carried out, Nevin teaching only graphics defining a relationship between nodes, not between a document and a node, it being reiterated that, by contrast, the graphics

location of nodes in the present invention is merely a matter of convenience. In effect, the Examiner is basing a rejection on the applicants own teachings, reading into Nevin what simply doesn't exist in Nevin.

Step (i) of claim 1 sets forth a displaying of the net at the display in combination with one or more document symbols, each representing a document located in correspondence with the calculated relative distance. With respect to this step, the Examiner has identified ¶¶0033, 0084 and Fig 2 of Nevin. As set forth in ¶19 of the declaration, there are no document symbols and calculated relative distance described or suggested in Nevin, which only describes a positioning and relative relationship between nodes. As further set forth at ¶20 of the declaration, ¶0084 and Fig. 2 of Nevin represent an algorithm to determine what nodes belong together and once a net is developed by Nevin, that is the final result. That's it, he's finished. By contrast, in the instant application the net is merely a platform for organizing documents and, as noted, Nevin does not display document symbols or as much as consider such an arrangement. Step (j) of claim 1 provides for visually examining the display of the net and document symbols and the Examiner has identified ¶0084, lines 14-17 of Nevin with respect to this step. As set forth at ¶22 of the declaration, Nevin is irrelevant with respect to step (j) inasmuch as there are no documents in Nevin and there is no display of document symbols.

Step (k) of claim 1 provides for determining from the document symbol locations at the display, those documents, if any, which are more likely to correspond with the text criteria. The Examiner has identified ¶¶0313 and 0315 of Nevin with respect to this step commenting that the user determines which categories are considered to be good or bad. As set forth at ¶24 of the declaration, the pertinent paragraphs of Nevin have no applicability, there being no determination with respect to document symbol locations at the display and from those symbol locations determining if any are more likely to correspond with text criteria. There can be no way to equate step (k) with the teachings of Nevin. As before, the applicants are being rejected on their own teaching.

Claim 2, dependent upon claim 1 should be considered allowable for reasons given in connection with claim 1.

Claim 3 sets forth that step (g) loads the text criteria into a positive designated one of the nodes. The Examiner has indicated that the claim is described at ¶¶0031 and 0083, lines 4-14 of Nevin, commenting that data is stored in the nodes and that a node can have a positive position. As set forth at ¶26 of the declaration, the present invention has no concern with the position of nodes. The technique of Nevin is not concerned with whether a node is positive or negative and, in particular, positively or negatively attracting certain textual content in the sense of the present invention.

Claim 4 describes that step (f) forms the net as comprising a positive designated node and a null designated node connected by an interaction. The Examiner has cited Nevin at ¶¶0083, 0084, lines 4-14 and ¶0123. The Examiner states that the last node is used as the null node and the nodes are connected by lines to demonstrate an interaction.

As set forth at ¶28 of the declaration, a null node in accordance with the invention, is a node which has no content in it and therefore attracts no documents at all. By contrast, Nevin describes that during data entry, if you don't identify the node you are interested in, the program, as a default convention, will put the argument on the last node. This has no resemblance to the utilization of a null node as taught in the present invention.

Claim 5 describes that step (e) determines the text criteria as criteria document textual material and the Examiner has cited column 6, lines 33-47 of Bluhm with respect to this component of the claim. As set forth at ¶29 of the declaration, there is nothing in Bluhm that remotely suggests criteria document textual material which is used to evolve a search question as established in claim 1. As set forth at ¶30 of the declaration, step (g1) normalizing said criteria document textual material is being identified by the Examiner with Bluhm at column 22, lines 40-44. There is no criteria document textual material as much as suggested in Bluhm, let alone its normalization. As noted at ¶31 of the declaration, step (g2) for fingerprinting the normalized criteria document textual material is said to be seen in Bluhm at column 26, line 8 through column 27, line 14. As stated above, the type of fingerprinting set forth in detail in Bluhm is of a word vector type which would render subsequent steps from step (g) in claim 1 as being inoperative.

Claim 6 provides that step (e) determines positive text criteria and negative text criteria with respect to a document population, the Examiner citing Nevin ¶0084, lines 4-14. As set forth at ¶32 of the declaration, Nevin is not concerned with criteria employed initially to evolve a search question. Step (f) of claim 6 provides for the formation of a net comprising one or more positive designated nodes, one or more negative designated nodes and one or more interaction, the Examiner citing ¶0084 of Nevin, lines 4-14. As set forth at ¶33 of the declaration, Nevin does not use interactions between positive and negative nodes but uses relationships generally identified by node position and as noted above, the position of the nodes in the present invention is arbitrary.

Step (g) of claim 6 provides for the loading of positive text criteria into positive designated nodes and negative text criteria into negative designated nodes, the Examiner citing ¶0031 of Nevin with respect to this step and has indicated that data is stored in the nodes. As set forth at ¶34 of the declaration, while data might be stored in nodes, it is stored for a different

purpose than the present invention, the present invention storing text criteria to develop a question for a search.

Step (h) of claim 6 provides for the calculation for each document of the database, its geometric relative distance from both positive designated nodes and negative designated nodes and the Examiner has cited ¶¶0031 and 0185 of Nevin with respect to this step, commenting that the connection strength of the link from one node to another is considered to represent relative distance. As set forth at ¶35 of the declaration, the Examiner fails to observe that the step at hand is one wherein this distance is calculated with respect to documents and nodes and not between nodes as described in Nevin. Nevin is not concerned with developing a question for carrying out a search nor a document organization technique, but a technique for graphically representing entity-relationship diagrams.

Claim 7, dependent upon claim 1, should be considered allowable for reasons given in connection with claim 1 and additionally because there are no document symbols in any of the references.

Step (l) of claim 8 provides for retrieving the identification of those documents resulting from step (k), and further, step (n) of that claim provides for reviewing one or more of the documents identified in step (l) and determining the quality of the match thereof with step (e) text criteria, the Examiner citing ¶¶0313 and 0315 of Nevin with respect to this step. As set forth at ¶37 of the declaration, with respect to claim 8 the paragraphs of Nevin which have been cited have no relationship to documents, are not describing the same operation or even a similar operation and are not evaluating the quality of the match of documents with text criteria.

Step (n) of claim 9 provides for the identification of new text criteria as a result of step (m) determination of insufficient quality of match, step (o) of claim 9 provides for the adding of the identified new text criteria to the step (g) text criteria loaded in the positive node, and step (p) of claim 9 reiterates steps (h) through (m) and the Examiner has cited ¶¶0313 and 0315 of Nevin with respect to these steps.

As set forth at ¶39 of the declaration with respect to claim 9, Nevin identifies the properties of nodes precisely and in advance whereas by contrast new text criteria with the present invention is determined to improve a search question and the developed new test criteria is loaded into the positive node, whereupon there is a reiteration of steps (h) through (m) and Nevin is not concerned with documents and the steps constituting a searching of their contents or any other kind of interactive process.

Step (q) of claim 10 describes that subsequent to step (m) an identifying and viewing at said display a list of features common to those documents, the identification of which was retrieved in step (s), a step (r) identifying a new text criteria in correspondence with step (q) and

viewing features common to those documents, the identification of which was retrieved in step (l), a step (s) of adding the identified new text criteria to the step (q) text criteria loaded into the positive node, and step (t) reiterating steps (h) through (m), and the examiner has cited ¶¶0313-0316 of Nevin with respect to this claim.

As noted at ¶41 of the declaration, claim 10 looks to the extraction of common features and an iterative process which functions to improve the development of a question for carrying out a search by improving a question or rule and Nevin has nothing to do with such document evaluation but does deal with similarities or relationships between nodes and not documents and interactions associated with nodes, and further there are no search related steps in Nevin and no criteria addition to improve the capabilities for carrying out a search and, lastly Nevin doesn't carry out steps (q) through (s) and certainly does not reiterate them as set forth at step (t).

Step (k1) of claim 11 provides for determining additional text criteria where the document symbol locations are not likely to correspond with such text criteria, and step (k2) provides for adding additional text criteria to the text criteria determined at step (e). The Examiner has cited ¶¶ 0313-0316 of Nevin with respect to this claim.

As noted at ¶43 of the declaration, Nevin is not addressing the subject matter of documents nor the development of a question for search activity associated with documents nor does Nevin address the subject matter of adding additional text criteria to improve a question used for search.

Claim 12 provides that step (l) is carried out by drawing at the display of a net a boundary defining region of the document symbols and the Examiner has cited ¶0320 of Nevin with an indication that the boundary region is determined by the available screen space.

As set forth at ¶45 of the declaration, Nevin at ¶0320 is describing the accommodation of a need for arithmetically changing the shape of a net within the space confines of the display. By contrast, claim 12 selects a grouping of documents by drawing boundaries on the display around document symbols. There are no document symbols in Nevin nor a technique for selecting them.

Now looking to independent claim 13 and the next family of claims, step (f) of claim 13 provides for selecting a document attribute to be correlated and the criteria for establishing an attribute value match. The Examiner has cited column 6, lines 33-47 presumably of Bluhm with respect to this step. As set forth at ¶47 of the declaration, step (f) of claim 13 is associated with two delimited regions at the display that is further associated with step (g) determining value matched pairs, and column 6, lines 33-47 of Bluhm have nothing to do with the procedures of claim 13, Bluhm being concerned with database management and the partitioning of documents

into one or more collections as opposed to the instant method wherein text search attributes are employed which are not database predetermined collections.

Step (g) of claim 13 provides for determining the presence of one or more document attribute value matched pairs between first and second regions and the Examiner has cited the same column 6, lines 33-47 of Bluhm. As set forth at ¶48 of the declaration, there are no document symbols in Bluhm and there are no regions in Bluhm and there are no document attribute value matched pairs in Bluhm.

Step (b) of claim 13 provides for forming one or more nets, each comprising at least two nodes associated by at least one interaction, one or more of the nodes representing an evaluation criteria and one or more being viewable at the display, and the Examiner has cited Fig. 1 and ¶0081 of Nevin. As set forth at ¶49 of the declaration, Nevin stores all of the data in nodes whereas document criteria are stored in the nodes of the instant invention and further with respect to the entirety of claim 13, there is nothing in Nevin describing how two nets would interact with each other, that is two nets are used together to do a searching feature that neither net could do alone. The searching feature in this case is the development of question which may be used to carry out a search.

Step (c) of claim 13 provides for treating the documents to have an attribute value and calculating for each document a geometric relative distance with respect to node criteria and displaying corresponding document symbols. The Examiner has cited ¶¶0031 and 0185 of Nevin, with respect to this step stating that the connection strength of the link from one node to another is considered to represent relative distance. As set forth in ¶51 of the declaration, the Examiner's analysis of step (c) of claim 13 is incorrect for reasons stated above in the declaration and particularly because Nevin has nothing to do with document symbols nor calculation of relative distance of document symbols with respect to node criteria. There are no document symbols in Nevin.

Step (d) of claim 13 provides for delimiting at the display a first region of the document symbols, and the Examiner cites ¶0031 and Fig. 1 of Nevin with respect to this step, stating that linking the nodes together is considered to represent delimiting and the connection of node 1 to node 2 is considered to represent a first region. As provide at ¶53 of the declaration, with respect to step (d) of claim 13 there is no concept of region at all in Nevin and the Examiner's observation that connecting two nodes together constitutes a region is simply incorrect. The Examiners indication that linking nodes together represents delimiting is incorrect and there are no document symbols in Nevin to establish a delimited region.

Step (e) of claim 13 provides for delimiting at the display a second region of document symbols and the Examiner has applied the same rejection as provided with respect to step (d).

As set forth at ¶54 of the declaration, the applicants submit that there are no document symbols in Nevin, there are not two regions in Nevin which are delimited, and the linking of node 2 to node 3 does not constitute a region of document symbols.

Step (h) of claim 13 displays correlations as are developed in connection with step (g) as they exist between first and second regions. The Examiner's has cited ¶0033 of Nevin, stating that the display of nodes based on a location calculated from force parameters is considered to represent displaying correlations. As set forth at ¶55 of the declaration, the Examiner's statement is simply and totally incorrect. Nevin is concerned with entirely different subject matter where for correlation two or more nodes are bound in space is unrelated to the invention where correlation is concerned with showing how two nets work together to show how a set of documents are closely grouped within two or more organized systems (nets).

Claim 14 provides that step (d) provides a first region extending over more than one net and includes a step (d1) of mapping the first region to a first document set by selecting the union or intersection of documents on different nets. The Examiner has cited ¶0031 and Fig. 1 of Nevin without comment.

As set forth at ¶56 of the declaration, there are no document symbols in Nevin, there is no development of a search question in Nevin, there is no first region in Nevin, there is no first region extending over more than one net in Nevin, there is no suggestion of mapping of the first region to a first document set by selecting the union or intersection of documents on different nets in Nevin.

Claim 15 is similar to claim 14 but provides the second region extending over more than one net and includes the step of mapping the second region to a second document set by selecting the union or intersection of documents on different nets. The Examiner has cited the same components of Nevin with respect to claim 15, and the same response provided with respect to claim 14 also applies to the rejection of claim 15 in that no regions over nets and no mapping by selecting the union or intersection of documents on different nets is so much as suggested in Nevin as set forth in ¶57 of the declaration.

Claim 16 provides that step (f) selects the criteria for establishing attribute value match by defining an attribute value tolerance, and the Examiner has cited column 6, lines 33-47 of Bluhm without comment. As set forth at ¶59 of the declaration, as stated above, column 6, lines 33-47 of Bluhm has no relevance to establishing an attribute value match by defining an attribute value tolerance and there is no suggestion whatsoever in Bluhm of employing tolerance for any purpose.

Claim 17, dependent upon claim 16 provides that step (g) determines the presence of a document of an attribute matched pair by determining whether the attribute value of a document

in the first region is equal to the attribute value of a document in the second region within the attribute value tolerance. The Examiner has again referred to column 6, lines 33-47 of Bluhm with respect to this claim.

As set forth at ¶61 of the declaration there are no first and second regions suggested in Bluhm, as is quite apparent there is no determination of the presence of a document attribute matched pair between regions within an attribute value tolerance suggested in Bluhm as additionally discussed above in connection with claim 16.

Claim 18 recites that step (d) is carried out by providing a computer generated line or lines visible at the display, and the Examiner has cited ¶0083 of Nevin with respect to this claim.

As set forth at ¶63 of the declaration claim 18 with respect to step (d) draws computer generated lines delimiting a first region of document symbols at the display, there are no document symbols nor are there regions suggested in Nevin, Nevin only describing the positioning of lines between nodes which basically are representations of some predetermined relationship between two nodes, an arrangement that has no relevance whatsoever to claim 18.

Claim 19 provides that step (e) delimits a second region of document symbols by providing a computer generated line or lines visible at the display, and the Examiner has cited ¶0083 of Nevin. As set forth in ¶64 of the declaration as discussed in connection with claim 18, Nevin provides a line which basically is a representation of some predetermined relationship between two nodes which has no suggestion of delimiting a second region of document symbols as well as no suggestion of document symbols at all, and no suggestion of delimiting by computer generated lines about these document symbols.

Claim 20 provides that step (h) is carried out by providing a visible line at the display connecting two document symbols and representing the correlation developed in connection with step (g) of claim 13. The Examiner has cited ¶0083 of Nevin with respect to this claim. As set forth at ¶65 of the declaration, the commentary given above in connection with claims 18 and 19 applies, but now with respect to providing a visible line between two document symbols representing a correlation, the present invention having document symbols and nodes, Nevin having only nodes.

Claim 21 provides that step (f) selects said document attribute to be correlated and the criteria for establishing an attribute value match through selecting the document attribute or document identification and step (g) identifies the same document in each of the first and second regions as a correlation. The Examiner has cited ¶¶0093, lines 4-7 and 0094 of Nevin in rejecting this claim.

As set forth at ¶67 of the declaration, claim 21 looks to see where a particular document symbol appears in two different kinds of organizations, and Nevin concerns no document

symbols, no regions and provides no discussion of correlation but only the relationship between nodes, not document symbols.

It is noted that claims 22-24 have been rejected under §103 of the Patent Statute as being unpatentable over United States application publication No. 2004/0078366 to Crooks, et al., (hereinafter Crooks, et al.) in view of Nevin.

As set forth at ¶69 of the declaration, Crooks, et al., is an approach wherein there is parsing of a health care order based on the parsing identification and interpretation of specific keywords, terms and abbreviations, wherein essentially a string-based order is parsed and "normalized", e.g., matched and replaced input with actual terms, to determine specific components such as drug dosage whereupon a distance is assigned using the well-known technique which identifies how many character changes had to be made to achieve a match with the rule-based database. Crooks, et al., is not fingerprinting nor comparing fingerprints or employing interactivity or a graphical component.

As set forth at ¶70 of the declaration with respect to step (b) of claim 22 identifying the population of documents to be searched, there is no search of documents in Crooks, et al., but there is a search of a database of rules and only for the purpose of interpreting a medical order, no attempt being made to search for a document, or place the document in any type taxonomy.

As set forth at ¶71 of the declaration step (c5) provides for setting an offset and factor for numeric class, for instance, determining whether a number is within a particular range, the step representing an aspect of achieving a representation of text which is searchable as opposed to the Crooks, et al., approach which seeks an accurate grammatical representation.

As set forth at ¶72 of the declaration step (c8) provides that for each accessed, W, which is a number, converting such a number into a sequence of word numbers, WN, and normalizing these word numbers for fingerprinting, the Examiner citing ¶0024, lines 1-28 of Crooks, et al., and Crooks, et al., has nothing comparable to normalizing word numbers as, WN.

As set forth at ¶73 of the declaration, step (c9) of claim 22 provides for marking the position and link of each, W, or normalized word number, WN, and the Examiner has cited ¶0026, lines 31 *et seq.*, of Crooks, et al.

As set forth at ¶74 of the declaration, Crooks, et al., at the above cited paragraph and lines is concerned with an attempt to find an approximate match with the rule database, when an exact one cannot be found, the number of letters required to be changed to a match a rule term in the database representing a distance, and such an approach has no relationship to the recitation of step (c9).

Step (c10) of claim 22 provides that for each, W, or normalized, WN, completing the normalization by reiterating steps (c8) and (c9), and the Examiner has cited paragraph 0026,

lines 10-12 of Crooks, et al., with the commentary that refining is considered to represent repeating.

As set forth at ¶76 of the declaration with respect to the Examiner's commentary concerning step (c10) and the term "refining", the present invention is doing an iterative process to achieve optimal normalization while Crooks, et al., strives to obtain word matches and then refine by eliminating the junk, and there is no relationship between these methods nor their purpose.

Step (d) of claim 22 provides for fingerprinting the normalized documents. The Examiner has cited ¶¶24-26 of Crooks, et al., with respect to this step. As set forth at ¶77 of the declaration, there is no fingerprinting whatsoever taught by Crooks, et al.

Step (e) of claim 22 provides for forming one or more nets each comprising at least two nodes, one or more said nodes representing an evaluation criteria, said one or more nets exhibiting two or more spaced apart nodes connected by one or more interactions. The Examiner has cited Fig. 1 of Nevin with respect to this step. As set forth at ¶78 of the declaration, the applicants reiterate the commentary made in connection with claim 1 at step (f).

Step (f) of claim 22 provides that for each normalized document, calculating its geometric distance from a said node. With respect to this step the Examiner repeats the rejection made in connection with step (h) of claim 1. As set forth at ¶79 of the declaration, the applicants reassert their response concerning step (h) of claim 1.

Step (g) of claim 22 provides for displaying one or more nets at the display in combination with one or more document symbols representing a said document located in correspondence with said calculated relative distance. The Examiner has cited the same component of Nevin as cited with respect to step (i) of claim 1. As set forth at ¶80 of the declaration, the applicants reassert their response to that rejection in response to this rejection.

The final step of claim 22 provides for determining from said document symbol locations at said display, if any, those documents which are more likely to correspond with said evaluation criteria. With respect to this paragraph, the Examiner repeats the rejection asserted in connection with step (k) of claim 1. As set forth at ¶81 of the declaration, the applicants repeat the argument set forth at claim 1.

Claim 23 provides for steps (c8.1) through (c8.8) describing in detail step (c8) of claim 22. All of these steps were rejected based upon ¶¶0030 - 0032 of Crooks, et al. As set forth at ¶82 of the declaration, Crooks, et al., neither carries out nor suggests any of these steps.

As set forth at ¶83 of the declaration more specifically with respect to claim 23, step (c8.1), Crooks, et al., merely determines the presence of a date and uses it directly while the present step is developing a record that can be used for searching, Crooks, et al., carrying out

no conversion to a float or integer. With respect to step (c8.2), applying an offset and factor to improve fingerprinting. Crooks, et al., does not carry out fingerprinting whatsoever. As set forth at ¶84 of the declaration with respect to steps (c8.3)–(c8.8), there is no similarity or purpose in any way related to the teachings of Crooks, et al.

Claim 24 describes that step (c8.3) further comprises the step (c8.3.1) setting the precision of, P, the normalized word number, WN, and step (c8.8) is carried out until the number of said successive positions, S, deriving said second component equal the value of said precision, R. With respect to this claim, the Examiner cites ¶¶0030-0032 of Crooks, et al. As set forth at ¶86 of the declaration, Crooks, et al., is not utilizing precision, presumably for good reason, that one would not wish to use that approach in dealing with medical applications and both components of this claim utilize a precision function.

The claims in the application clearly distinguish and are patentable over the references of record. Further and favorable action is solicited.

Respectfully submitted,

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